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# Annual 47 C.F.R. 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2009

Date filed:

February 17, 2010

Name of Company covered by this certification:

DTC Cable Inc

Form 499 Filer ID:

826492

Name of signatory:

Douglas N. Edwards

Title of signatory:

Vice President

#### CERTIFICATION

I am the Vice President for the DTC Cable Inc. I hereby certify that I have personal knowledge that DTC Cable Inc has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 et seq. Accompanying this certificate is a statement explaining how DTC Cable Inc is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

Internet Service :: Cable Television :: Long Distance :: Computer Networking P.O. Box 271, Delhi, New York 13753 :: VOICE: 607-746-1500 :: FAX: 607-746



DTC Cable Inc has not taken any actions (i.e., proceedings instituted or petitions filed by a

company at either state commissions, the court system, or at the Commission against data brokers)

against data brokers in the past year.

DTC Cable Inc has not received any customer complaints in the past year concerning the

unauthorized release of CPNI.

DTC Cable Inc represents and warrants that the above certification is consistent with 47.C.F.R. 1.17

which requires truthful and accurate statements to the Commission. DTC Cable Inc also

acknowledges that false statements and misrepresentations to the Commission are punishable under

Title 18 of the U.S. Code and may be subject to enforcement action.

Douglas N. Edwards

Vice President

DTC Cable, Inc.

February 17, 2010

Attachment

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#### DTC Cable Inc – FCC 499 Filer ID 826492

### STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how DTC Cable Inc, a Long Distance Reseller operating in New York, is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2009(e)).

#### 1. Identification of CPNI

DTC Cable Inc has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

### 2. Identification of Services Affected by CPNI Rules

DTC Cable Inc has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the DTC Cable Inc that affects how DTC Cable Inc uses CPNI.

#### 3. Identification of Permissible Uses of CPNI without Customer Authorization

DTC Cable Inc has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

#### 4. Identification of Uses of CPNI Requiring Customer Authorization

DTC Cable Inc has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.



#### 5. Customer Notification and Authorization Process

DTC Cable Inc has implemented notification and approval procedures. DTC Cable Inc's training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the utilization of the specific notice and approval requirements under the FCC's Part 64, Subpart U, Section 64.2007 (f)(2) of the CPNI rules.

## 6. Training

DTC Cable Inc has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

### 7. Record of Customer CPNI Approval/Non-Approval

DTC Cable Inc has developed a system for maintaining readily accessible record of whether a customer has responded under the Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

### 8. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, DTC Cable Inc has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

## 9. Software Safeguards

DTC Cable Inc has established procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

# 10. Supervisory Review Process for Outbound Marketing

DTC Cable Inc has established a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.